Case 1:03-cv-01570-BMC-RML Document 491-1 Filed 08/07/13/2348age 1 of 10 PageID #: 8069

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AO 88A (Rev. 06/09) Subposts to Testify at a Deposition in a Civil Action

RYEH GUTMAN, individually and on b	UNITED STATES		
to Z Holding Group., A To Z CAPITAL AZ FRANKLIN COMPANY and WASH SSOCIATES and, individually by 185 h	CORP., INGTON GREENE	the Eastern District of New	/ York
ARK OFFICES LLC	laintiff	)	#: W #
•	V.	J 03 Civ 1570 (JG Civil Action No.	(RML)
ALMAN KLEIN, DIANA KLEIN, RACHE	EL BRACH, RODNEY CAPITAL CON		
OYV CORPORATION, FURNITURE M		Of the action is pending	in another district, state where:
CAPITAL CORP., PAZ FRANKLING	<i>fendani</i> COMPANY, WASHINGTON GREEN	) . E	)
	BPOENA TO TESTIFY AT A D	EPOSITION IN A CIVI	LACTION
deposition to be taken in t one or more officers, dire	1204 ARE COMMANDED to appear this civil action. If you are an organitors, or managing agents, or designs, or those set forth in an attachment.	nization that is not a party nate other persons who cor	in this case, you must designate
			~
Place; Law Offices of Victo	or A. Worms, P.C.	Date and Time:	
85 Broadway, Suite New York, New Yo		August 13, 2012 at	10:00 a.m.
1 1307 1314, 132 13	7		The second section of the second
The deposition wi	Il be recorded by this method: _st	enographic recording	
	or your representatives, must also od information, or objects, and pen	nit their inspection, copyir	
45 (d) and (e), relating to y attached.	Fed. R. Civ. P. 45(c), relating to yo our duty to respond to this subpost	ur protection as a person s as and the potential conseq	ubject to a subpoent, and Rule uences of not doing so, are
The second secon			
	CLERK OF COURT	OR	•
	)EndAtor		
	Signature of Clerk or Deputy Clerk		Attorney's signature
The name, address, e-mail,	and telephone number of the attorn		
Victor A. Worms, Esq.	بنبيت سيسبب سيست	, who issues or	requests this subpoens, are:
65 Broadway, Sulte 750 New York, New York 10006 212-374-9590, email: vworms	@vìètorawonnspe.com		
The state of the s			

- 1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
- 2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
- 3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
- 4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
- 5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
- 6. The names of all limited liability companies in which you are a member. including a copy of any operating agreements and any amendments thereto.
- 7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
  - 8. Copies of your state and federal tax returns for the years 2009 to the present.
- 9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

	ES DISTRICT COURT
EH GUTMAN, individually and on behalf of	for the Eastern District of New York
Holding Group., A To Z CAPITAL CORP.,	•
FRANKLIN COMPANY and WASHINGTON GREENE	
OCIATES and, individually by 185 MARCY, LLC and	
OFFICES, LLC.	. )
Plaintiff	) 03 Civ 1570 (JG)(RML)
<b>v.</b>	) Civil Action No.
IAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL	COMPANY,
/ CORPORATION, FURNITURE MANUFACTURING GROUP.,	) (If the action is pending in another district, state where:
Z HOLDING GORP., A to Defendant	)
PITAL CORP., PAZ FRANKLING COMPANY, WASHINGTON GR	EENÉ .
OCIATES, JOHN DOE 1-10. SUBPOENA TO TESTIFY AT	A DEPOSITION IN A CIVIL ACTION
To: Simon Klein	
(333 55th Street)	· ·
Brooklyn, New York 11219	
AS Testimony: YOU ARE COMMANDED to ap	pear at the time, date, and place set forth below to testify at a
deposition to be taken in this civil action. If you are an	organization that is not a party in this case, you must designate
	designate other persons who consent to testify on your behalf
about the following matters, or those set forth in an atta	chment:
Place: Law Offices of Victor A. Worms, P.C.	D. J. T.
65 Broadway, Suite 750	Date and Time:
	August 9, 2012 at 10:00 a.m.
New York, New York 10006	
The deposition will be recorded by this method	stenographic recording
	t also bring with you to the deposition the following documents of permit their inspection, copying, testing, or sampling of the ment.
	,
* • *	
m' 11 m 1 m at m 46/1 1.1	g to your protection as a person subject to a subpoena, and Rule
45 (d) and (e), relating to your duty to respond to this s attached.	ubpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.	
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012 DOUGLAS C. I	ubpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.	ubpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012 DOUGLAS C. I	ubpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012 DOUGLAS C. I	ubpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012 DOUGLAS C. I	obpoena and the potential consequences of not doing so, are
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012  CLERK OF COURT  Signature of Clerkor Deput	OR  Altorney's signature
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012  CLERK OF COURT  CLERK OF COURT	OR  Altorney's signature
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012  CLERK OF COURT  Signature of Clerkor Deput	OR  OR  Attorney's signature  e atterney representing (name of party)  Plaintiffs
45 (d) and (e), relating to your duty to respond to this s attached.  Date UL 0 6 2012  CLERK OF COURT  Signature of Clerkor Deput	OR  Altorney's signature

- 1. All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
- 2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
- 3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
- 4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
- 5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
- 6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.
- 7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
  - 8. Copies of your state and federal tax returns for the years 2009 to the present.
- 9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.

## AO 88A (Rev. 06/09) Subpoens to Testify at a Deposition in a Civil Action

	UNITED STATES D	ISTRICT COURT
	MAN, individually and on behalf of	; Eastern District of New York
	g Group., A To Z CAPITAL CORP.,	A DESCRIPTION OF TOTAL
	LIN COMPANY and WASHINGTON GREENE	
	S and, individually by 185 MARCY, LLC and	
PARK OFFIC	Plaintiff	
	Y. Y.	03 Civ 1570 (JG)(RML)
7A1 MANN 121	EIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COMPA	Civil Action No.
TOYV CORE	ORATION, FURNITURE MANUFACTURING GROUP.	(If the action is pending in another district, state where:
	ING GORP., A to Defendant	to me make a pendung in miconer district state where.
	CORP., PAZ FRANKLING COMPANY, WASHINGTON GREENE	
	S, JONH DOES 1-10. SUBPOENA TO TESTIFY AT A DEF	POSITION IN A CIVIL ACTION
	To: Chesky Braun	
	To: Cheany Bladin	
	Brooklyn, New York 11219	
	Testimony: YOU ARE COMMANDED to appear at	the time, date, and place set forth below to testify at a
	deposition to be taken in this civil action. If you are an organiz	ration that is not a party in this case, you must designate
	one or more officers, directors, or managing agents, or designa	
	about the following matters, or those set forth in an attachment	
	Place: Law Offices of Victor A. Worms, P.C.	Date and Time:
	65 Broadway, Suite 750	August 10, 2012 at 10:00 a.m.
	New York, New York 10006	
يد	. The deposition will be recorded by this method:stell	nographic recording
• • •	. The deposition will be received by this method.	
	Exproduction: You, or your representatives, must also b	ring with you to the deposition the following documents,
١,	electronically stored information, or objects, and perm	it their inspection, copying, testing, or sampling of the
	material:	
<b>*</b>	See affect	The state of the s
ļ	see affect	himent. When
		number of the second pulse of the second pulse
· ·	The provisions of Fed. R. Civ. P. 45(e), relating to you 45 (d) and (e), relating to your duty to respond to this subpoen	or protection as a person subject to a subpoena, and Rule
3.€7		
i		. K. K. P
:	PINAL 0 6 2012	
1	CLERK OF COURT	
į	1 200	OR
	12000	
	Signature of Glerk or Deputy Clerk	Astorney's signature
		Plaintiffs
	The name, address, e-mail, and telephone number of the attorn	ey tepresentatig (name of porty)
	VICTOT A. WOTTHE, ESQ.	, who issues or requests this subpoena, are:
	65 Broadway, Suite 750	
	New York, New York 10006	
	212-374-9590, email: vworms@viotorawormspc.com	
	ę	

- All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
- 2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
- 3. Copies of all bank statements for all bank accountants which you maintain for the years 2009 to present, whether in your individual name or jointly with some other person or entity.
- 4. All documents evidencing or reflecting all real properties owned by you, whether in your individual name or jointly with some other person or entity.
- 5. The names of all corporations in you are a shareholder, including a copy of any shareholder's agreements and any amendments thereto.
- 6. The names of all limited liability companies in which you are a member, including a copy of any operating agreements and any amendments thereto.
- 7. The names of any trusts in which you are the creator, the beneficiary or the trustee.
  - 8. Copies of your state and federal tax returns for the years 2009 to the present.
- 9. A List of all lawsuits in which you are or have been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

ARYEH GUTMAN, individually and on behalf of	TES DISTRICT COURT
to Z Holding Group., A To Z CAPITAL CORP.,	for the Eastern District of New York
AZ FRANKLIN COMPANY and WASHINGTON GREENE	, , , , , , , , , , , , , , , , , , , ,
SSOCIATES and, individually by 185 MARCY, LLC and	
ARK OFFICES, LLC	•
Plaintiff	- (
v.	) 03 Civ 1570 (JG)(RML) ) Civil Action No.
ALMAN KLEIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL	OOMBANK
OYV CORPORATION, FURNITURE MANUFACTURING GROUP.,	
to Z HULDING GORP A to Defendant	(If the action is pending in another district, state where:
CAPITAL CORP., PAZ FRANKLING COMPANY WASHINGTON OF	)
SSOCIATES, JONH DOES 1-10. SUBPOENA TO TESTIFY AT	LA DEPOSITION IN A CIVIL ACTION
LIMITED EACTORING THE	A DEI OSITION IN A CIVIL ACTION
To: UNITED FACTORING, LLC	
Procedure No. W. L. Cons	
Brooklyn, New York 11229	
denogition to be taken in this sixtle will an	opear at the time, date, and place set forth below to testify at a
The state of the s	ODVANIZATION that is mot a marky in this age, are all the
one of more officers, directors, of managing agents, or	Officially of the percond who consent to tool C
about the following matters, or those set forth in an atta	chment:
· Pro-	
Place: Law Offices of Victor A. Worms, P.C.	Date and Time:
65 Broadway, Suite 750	August 7, 2012 at 10:00 a.m.
New York, New York 10006	Adgust 7, 2012 at 10.00 a.m.
The deposition will be recorded by this method  (IXProduction: You, or your representatives, must electronically stored information, or objects, and	t also bring with you to the deposition the following documents, d permit their inspection, copying, testing, or sampling of the
· material:	
$\leq$ 0.0 $\star$	Herelyment. (m)
Jea q	Hechmed. (M)
The provisions of Fed. R. Civ. P. 45(c), relating 45 (d) and (e), relating to your duty to respond to this su attached.	to your protection as a person subject to a subpoena, and Rule abpoena and the potential consequences of not doing so, are
Dept 1 0 6 2012	
V V	and the winds of the second of
CLERK OF COURT	
100	OR
( ) GLI U O A	
Signature of Clerk or Depun	Clerk Attorney's signature
The name, address, e-mail, and telephone number of the	
Victor A. Worms	, who issues or requests this subpoena, are:
Victor A. Worms, Esq.	and the same of th
65 Broadway, Suite 750	
New York, New York 10006 212-374-9590, email: vworms@victorawcrmspc.com	

- 1. All documents evidencing or reflecting the names and addresses of all members of United Factoring, LLC.
- 2. The filing receipt, operating agreement any amendments thereto for United Factoring, LLC and any corporate resolutions for the years 2009 to the tenant present.
- 3. All documents reflecting or evidencing any communication or correspondence between United Factoring, LLC and Zalman Klein for the years 2009 to the present.
- 4. All documents reflecting or evidencing any agreements between United Factoring, LLC and Zalman Klein for the years 2009 to the present.
- 5. Copies of all bank statements for all bank accountants maintain by United Factoring, LLC C for the years 2009 to present.
- 6. All documents evidencing or reflecting all real properties owned by, United Factoring, LLC including all deeds for any such real properties.
- 7. Copies of the state and federal tax returns for United Factoring, LLC for the years 2009 to present.
- 8. A list of all lawsuits in which United Factoring, LLC is or has been a party, whether as a plaintiff or as a defendant, and the names of the courts in which any such lawsuits were commenced.

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

10 · 1

	UNITED STATES	DISTRICT COURT
	MAN, individually and on behalf of for	the Eastern District of New York
	g Group., A To Z CAPITAL CORP.,	Manager conduction subgroup a second 2 std. book on the std. A recorder.
	IN COMPANY and WASHINGTON GREENE	
	S and, individually by 185 MARCY, LLC and	
RK OFFIC	FS. LLC.  Plaintiff	}
	of the state of th	) 03 Civ 1570 (JG)(RML)
	ν.	) Civil Action No.
	EIN, DIANA KLEIN, RACHEL BRACH, RODNEY CAPITAL COM	
	ORATION, FURNITURE MANUFACTURING GROUP.,	(If the action is pending in another district, state where:
	NG GORP., A to Defendant	)
	CORP., PAZ FRANKLING COMPANY, WASHINGTON GREEN	
SOCIATES	S, JONH DOES 1-10. SUBPOENA TO TESTIFY AT A D	PEROSITION IN A CIVIL ACTION
	To: Diana Klein	
*	G7 Rodney Streets	
	Brooklyn, New York 11211	
	☑ Testimony: YOU ARE COMMANDED to appear	at the time, date, and place set forth below to testify at a
	deposition to be taken in this civil action. If you are an orga	
	one or more officers, directors, or managing agents, or design	
	about the following matters, or those set forth in an attachm	ent:
	Place: Law Offices of Victor A. Worms, P.C.	Date and Time:
,	65 Broadway, Suite 750	August 6, 2012 at 10:00 a.m.
	New York, New York 10006	August 0, 2012 at 10,00 a.m.
	The deposition will be recorded by this method:	stenographic recording • • • • • • • • • • • • • • • • • • •
	AXProduction: You, or your representatives, must als	o bring with you to the deposition the following documents,
	electronically stored information, or objects, and pe	mit their inspection, copying, testing, or sampling of the
	material:	
:	see at	tachment. (IN)
-	· ·	
		your protection as a person subject to a subpoena, and Rule
	45 (d) and (e), relating to your duty to respond to this subpo	ena and the potential consequences of not doing so, are
	attached. DOUGLAS C. PALM	1 TO 7 A
	THE ACCOUNT OF MALLINE	
	Delt 0 6 2012	
*	CLERK OF COURT	
	The state of the s	OR
	Ofcina Offser	<u>-</u>
	Signature of Clerk or Deputy Cl	erk Attorney's signature
•		Plaintiffs .
	The name, address, e-mail, and telephone number of the atte	officy representing (name of party)
		, who issues or requests this subpoena, are:
	Victor A. Worms, Esq.	
	65 Broadway, Suite 750	
	New York, New York 10006 212-374-9590, email: vworms@victorawormspc.com	
_	TITE OF A 2000' OFFICE AND THE STREET OF A	

- All documents reflecting or evidencing any communication or correspondence with Zalman Klein for the years 2009 to the present.
- 2. All documents reflecting or evidencing any agreements with Zalman Klein for the years 2009 to the present.
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